

Blue/Yellow Highlights: Notes for Co-Lab & things to input at a later date

[Bolded/Bracketed language]: Things for Co-Lab to input at a later date

Green Highlights: Things changed/added since last meeting

Co-Lab-o-Rate

PRIVACY POLICY

Last Updated: *[date updated]*

1. INTRODUCTION

At **Co-Lab-o-Rate** (“we”, “us”, “our”), we value your privacy. This **Privacy Policy** (“policy”) describes how Co-Lab-o-Rate, collects, uses, and shares personal information of Visitors (“visitors”) to this **Website**, *[name of domain]* (the “site” or “our services”). We know that **Our Members** (“you,” “your”, “members”) care about how your personal information is used and shared, and we take your privacy seriously. By using our site, you consent to the collection and use of personal information in accordance with this policy. By using our site, you also agree to be bound by the Terms of Service as set forth **[HEREIN *[insert hyperlink]*]**.

BY USING OUR SITE OR SERVICES OR SUBMITTING PERSONAL INFORMATION THROUGH OUR SITE OR SERVICES, YOU AGREE TO THE TERMS OF THIS PRIVACY STATEMENT AND YOU EXPRESSLY CONSENT TO THE PROCESSING OF YOUR PERSONAL INFORMATION ACCORDING TO THIS PRIVACY STATEMENT. IF YOU DO NOT WANT INFORMATION ABOUT YOURSELF TO BE USED IN THE MANNER SET FORTH IN THIS PRIVACY POLICY, DO NOT USE THE SITE.

Third Party Sites. This policy covers our treatment of **Personally Identifiable Information** (“personal information”) that we gather when you are accessing or using our site. This policy does not apply to the practices of companies or individuals that we do not own or control. We are not responsible for the content on, or privacy practices of, any websites or services not owned by Co-Lab-o-Rate to which this site links to or that links to this site. Visitors will need to check the privacy policies of these other websites to understand their policies. Visitors who access a linked site may be disclosing their personal information.

Terms of Service. You are strongly encouraged to also visit our Terms of Service as set forth **[HEREIN *[insert hyperlink]*]** that explain other terms governing the use of our site and associated Co-Lab-o-Rate offerings.

2. WHAT INFORMATION WE COLLECT

We gather various types of personal information from our visitors as explained more fully below. **[We may (or will not depending on Co-Lab's decision) also share certain types of personal information with third parties as described below.]** We collect the following types of information:

Passive Information We Collect About You

Information Automatically Collected. **[(All of the language in this paragraph will depend on what exactly Co-Lab-o-Rate chooses to collect.)]** When you visit [domain name], some information is automatically collected, including your [location data, IP address, browser type, system type, the content and pages that you access on [domain name], the “referring URL” (i.e., the page from which you navigated to on [domain name], and from which you leave [domain name], as well as the time you spend on [domain name]. In addition to using Uniform Resource Locators (URL), we also use Cookies to gather information regarding the date and time of your visit and the information from which you searched and viewed.]

Cookies and Other Tracking Technologies. A cookie is a small data file that we transfer to your computer's hard disk. We use cookies to collect additional website usage data, and to improve and personalize the Site and our service to you. **[We use cookies to collect personally identifiable information. We may use both session cookies and persistent cookies to better understand how you interact with the site and our service, to monitor aggregate usage by our visitors and web traffic routing on the site, and to improve the site and our services.]** A session cookie enables certain features of the site and our service and is deleted from your computer when you disconnect from or leave the site. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to the site. Persistent cookies can be removed by following your web browser help file directions. Most internet browsers automatically accept cookies. You can instruct your browser, by editing its options, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit.

We collect this information passively using technologies such as **[(This language is dependent on the technology Co-Lab decides to use for information collection, but provided here of what this clause might typically look like)]** standard server logs, cookies, and clear GIFs (also known as “web beacons”). We use passively collected information to administer, operate, and improve [domain name] and our other services and systems, and to provide services and content that are tailored to you. We may aggregate information collected from our visitors to show statistical data to our potential investors. **WE USE INFORMATION COLLECTED BY PASSIVE MEANS IN NON-PERSONALLY IDENTIFIABLE FORM ONLY. WE WILL NOT SHARE, SELL, RENT, SWAP OR OTHERWISE AUTHORIZE ANY THIRD PARTY TO ACCESS YOUR PERSONAL INFORMATION UNLESS**

AFFIRMATIVELY CONSENTED TO BY THE MEMBER. Entering any contest promoted on the site is viewed as affirmative consent to the sharing of personal member information.

Also, please be aware that third parties may set cookies on your hard drive or use other means of collecting information about your use of their services or content. We do not have access to, or control over, these third-party means of passive data collection. Such third parties include **[[affiliate(s)] over whom we exercise no control over nor assume responsibility for. We do not control the privacy practices of third parties, including our [marketplace affiliate(s), manufacturers, service enhancing application integrations, escrow and transaction services vendors, etc.]]**

Personal Information We Collect From You

We also collect and store personal information we receive from you, specifically information that you provide to us in a variety of ways on **[domain name]**. When you **[create an account, create a profile, make a purchase, request information about products or our services, request support, or otherwise communicate with us]** we collect the personal information that is provided to us.

Creating an Account. We may collect personal information from a member's **[profile/account]** on the site such as **[(include all information a member can include in their profile here) your name, age, e-mail address, contact preferences, username, password, browser information, third-party account credentials (for example your log-in credentials for social media or other third-party sites), city, state, country, billing address, and other demographic information.]** Personal information may also include information about a member's activities, such as, without limitation, information about their activity on **[domain name]**.

[We do not use personal information collected from you in a personally identifiable manner without your permission. (this language may change depending on how Co-Lab decides to use the personal information.)] We may aggregate the personal information collected from our visitors in a non-personally identifiable manner. Aggregate information is information that we collect about a group or category of products, services or customers that is not personally identifiable or from which individual identities are removed.

Third Party Account Information. If you provide your third-party account credentials to us, you understand some content and/or information in those accounts ("third party account information") may be transmitted into your account with us if you authorize such transmissions, and that third party account information transmitted to our site is covered by this policy. You can choose not to provide us with certain information, but then you may not be able to **[register, set up a profile/account, make a transaction, etc.]** with us or to take advantage of some of our features.

Web Site Transactions. To make a purchase, fulfill an order, or process a payment we will request a visitor to provide certain personal identifying information, which may include: *[(include all information that relates to completing a transaction on the site such as)* **name, postal address, e-mail address, telephone number, method of payment, and, if applicable, credit card number.** Co-Lab-o-Rate may request additional information necessary to establish and maintain customer's account. *[(If transactions are being outsourced to a third-party payment vendor, include language that those vendor's privacy policies apply).* **[We also may receive information from our vendors and suppliers about you regarding customer service interactions shipping information, etc.]**

Information Collected from Other Sources. To enhance our ability to provide relevant marketing, offers, and services to you and update our records, we may obtain information about you from other sources, such as *[(list "other sources" here)* **public databases, joint marketing partners, affiliate programs, data providers, social media platforms, and form other third parties. This information includes [.....]. If you interact with us on a social media platform using your social media account, we receive personal information about you such as [your name, email address.]]** Any personal information that we collect from your social media account depends on your social media account's privacy settings.

[Online Advertising and Marketing. *[(to include depending on if Co-Lab decides to have this type of advertising or not)* **Some companies that help us deliver interactive on-line advertising and marketing, such as [banner ads...etc], may collect and use information about our visitors to help us better understand the types of advertising or promotions that are most appealing to our visitors.]**

3. HOW WE USE YOUR INFORMATION

Personally Identifiable Information. Your privacy is very important to us. Accordingly, we *[(this language is dependent on whether Co-Lab decides to sell personal information to third parties or not)* **do not sell personally identifiable information about our members and visitors to third parties without their consent.**

Using Your Information to Aggregate Statistics. We may disclose aggregate statistics regarding visitor behavior as a measure of interest in, and use of, our website and e-mails to third parties in the form of aggregate data, such as overall patterns or demographic reports that do not describe or identify any individual visitor. We may also use non-personally identifiable aggregate statistics of our visitors for internal purposes such as to administer, operate and improve the site.

Disclosing Your Information to Third Parties. *(to alter depending on what Co-Lab decides to share with third parties)* We provide your information to third party services who work on behalf of or with us to provide some of the services and features of the site or services and to help us communicate with you. The services are *[(list relevant “services”)]* sending emails, analyzing data, providing marketing assistance, and conducting surveys. [These third parties are instructed not to disclose your personal information ,without your consent, or use your personal information except based on our instructions and in accordance with this Privacy Policy. Although we prevent third parties from the disclosure of personal information to the best of our abilities, we are not personally responsible for their practices.

Disclosing Your Information as a Part of a Merger, Sale, or Other Financing. n the event of a change in ownership, or a merger with, acquisition by, sale of assets, debt financing, or similar transaction, we reserve the right to disclose, sell, or transfer all of your personal information to that entity. Information, including personal information, may be disclosed and/or sold in the event of an insolvency, bankruptcy, or receivership in which personal information could be transferred and/or sold to third parties as one of our business assets.

Using Your Information to Create a Profile. We use your information to allow you to **[register and manage a member account/profile].**

Sharing Your Information with other Members. If you create a **[profile/account]** with us, other **[site members/and or visitors]** will be able to view certain personally identifiable information in your profile such as your **[name, age, geographic location, etc...]**. If you would like to limit what personally identifiable information is available to other site members, you have the option to **[make adjustments in the preferences page [of/in your account/profile].**

Using Your Information to Enable Member-to-Member Communications. We may process your information if you choose to use any of our offerings that allow for communication with another member through our *[(list options for member-to-member communications: message boards, direct messages, etc.)]*.

Using Your Information to Improve, Maintain, and Operate www.co-lab-o-rate.com. In addition, we may use personal information to provide services and information that you request; to enhance, improve, operate, and maintain the site, our programs, services, website, and other systems; to prevent fraudulent use of the site and services; to tailor your visitor experience; and to maintain a record of our dealings with you. We may use your information to send information including confirmations, invoices, technical notices, updates, security alerts, support and administrative messages, and for other administrative purposes.

Using Your Information for Customer Service. We may use your information to respond to comments and questions and provide customer service.

Using Your Information to Fulfill and Manage Your Orders. We may process your information to fulfill and manage your orders, payments, returns, and exchanges made through the services.

Using Your Information to Send Marketing and Promotional Communications. We may process the personal information you send to us for our marketing purposes if this is in accordance with your marketing preferences. You can opt out of our marketing emails at any time by **[clicking unsubscribe, etc.....]**.

Disclosing Your Information if Legally Required. We may also disclose personal information if we believe that doing so is legally required, or if it is in our interest to protect our property or other legal rights (including, but not limited to, enforcement of our agreements, policies, and terms of service), or the rights or property of others. We may use your personal information to protect, investigate, and deter against fraudulent, unauthorized, or illegal activity.

Feedback. If you provide feedback to us, we may use and disclose such feedback for any purpose, provided we do not associate such feedback with your personal information. We may occasionally use personal information associated with a visitor's feedback for testimonial purposes, but only with that visitor's consent.

4. Privacy Practices for Children Under 13 Years Old

Children's Online Privacy Protection Act. Co-Lab-o-Rate is committed to protecting the online privacy of children. In accordance with the Children's Online Privacy Protection Act ("COPPA"), we will not knowingly collect information from children under the age of thirteen without first obtaining parental consent from a child's parent or legal guardian.

We are required to directly notify a parent or legal guardian upon receiving their contact information and inform them that we have received their information in order to obtain parental consent. Prior to providing any personally identifiable information **[either by setting up a [member account/profile], placing an order for merchandise, or participating in any other activity offered through the site)**, children under the age of thirteen must have a parent or legal guardian give verifiable parental consent. The verifiable consent states that the child's parent or legal guardian consents to the collection and transfer of the child's personally identifiable information. If the site is notified that a child under thirteen is attempting to create an account, the site will request the child enter a parent's email address. The parent will receive a direct notice from us, via the provided email address, containing a consent form which the parent is required to print, sign, and return to us via U.S. mail, fax, or electronic scan. For any monetary transactions on the site made by a member under thirteen, a parent is required to use a payment method that provides notification of each transaction to the primary account holder.

The types of personally identifiable information we collect from children are [(list all information that is collected e.g. the name, e-mail address, home address, telephone number,) and/or any other information reasonably necessary for the child to participate in a particular activity. This information may be collected directly and/or passively (list all operators who will collect the personal information and how it will be used. e.g., through a Web server that automatically recognizes and stores information, such as a visitor's IP address/domain name combination).]

Parental Rights. Note that we are prohibited from conditioning a child's participation in an activity on the child's disclosure of more personal information than is reasonably necessary to participate in the activity. This means that if we don't need a specific piece of information (like the child's phone number) to allow the child to participate in an activity, we will not ask for it. Parents or legal guardians may review any personal information collected, request that any information be deleted, or refuse any further data collection by contacting us at [list contact information]

5. GDPR COMPLIANCE

*[*NOTE for Co-Lab:* To be in compliance with the GDPR, the privacy policy must:]*

- *Disclose ALL personal information that will be collected from users in the "what information we collect from you section."*
- *Disclose ALL of the legal basis/purposes for processing any personal data in the "how we use your information" section. The processing of data is illegal under the GDPR unless it can be justified according to one of six conditions in [Article 6](#). (consent, contractual necessities, legitimate business interests, legal obligations, vital interests, etc.).*
- *Data Storage and Retention (how data will be stored, how long it will be stored for, and how you will securely store it.)*
- *Data Rights (to access, rectify, erase, restrict, and object to data processing)*
- *Data Transfers (disclose the legal mechanism for doing so such as the Standard Contractual Clauses)*
- *Data Protection Officer's contact info*

- *Cookie Policy (disclose all information about cookie use, what cookies are used, and any other technologies that track users.)*
- *Right to Withdraw consent at any time*
- *Procedure for lodging a complaint with a supervisory authority*
- [*GDPR checklist can be found here*](#)

This policy has been prepared in line with the EU's General Data Protection Regulation (GDPR) as it applies to citizens of European Union countries and Switzerland.

Data Protection Officer (DPO). We have appointed a Data Protection Officer (DPO) to oversee our data protection activities. You can contact our DPO at **[insert contact information]**.

International Transfer of Information. Our servers are located in the United States. If you are accessing our site or services from outside the United States, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your information **(see How We Use Your Information above)**. We have implemented measures to protect your personal information, including by **[using the European Commission's Standard Contractual Clauses for transfers of personal information between us and our third-party providers]**. These clauses require all recipients to protect all personal information that they process originating from the EEA or UK in accordance with European data protection laws and regulations. The Standard Contractual Clauses can be provided upon request. We have implemented similar appropriate safeguards with third-party service providers and partners and further details can be provided upon request.

Data Storage and Retention. We will only keep your personal information for **[as long as it is necessary for the purposes set out in this policy]**, unless a longer retention period is required or permitted by law. No purpose in this notice will require us keeping your personal information for **[longer than the period of time in which users have an account for us.]** When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information.

Data Subject Rights. You have the right to (i) request access and obtain a copy of your personal information, (ii) to request correction or erasure (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make a request by contacting us at **[INCLUDE CONTACT INFO]**.

Where we rely on your consent for the processing of your personal information, you have the right to withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of processing based on consent before its withdrawal. You can withdraw your consent through certain features on our site such as (account privacy preferences, email unsubscribe link, etc.).

Opting Out of Marketing and Promotional Communications. You can unsubscribe from our marketing and promotional communications at any time by [(...clicking on the unsubscribe link, etc.).] You will then be removed from marketing lists but we still may communicate with you to send you service-related messages that are necessary for the administration and use of your account or for other non-marketing purposes.

[If you would like at any time to review or change the information in your (account/profile) or terminate your (account/profile) you can:] (describe how to review, edit or delete the account/profile)]

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your Member State data protection authority or UK data protection authority. If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.

6. CALIFORNIA RESIDENTS

If you are a California resident, you are granted specific rights regarding access to your personal information. In accordance with the California Consumer Privacy Act (CCPA) we will not distribute your personal information to outside parties without your consent or as specifically described above. We will not discriminate against any visitor who chooses to exercise their CCPA rights.

Categories of Personal Information Collected. The CCPA requires disclosure of certain categories of personal information collected in the past twelve months. The categories and examples provided in the chart are those defined in the CCPA but does not mean that all of the listed examples were in fact collected. More details regarding this can be found in the “**What Information We Collect**” section above. These categories are:

Category	Examples
A. Identifiers	Contact details, names, postal address, telephone numbers, unique personal identifiers, online identifiers, internet protocol address, email address, and account name

B. Personal information categories listed in the California Customer Records Statute (Cal. Civ. Code Section 1798.80(e))	Name, contact information, financial information, account login information, debit or credit card numbers, and precise geolocation
C. Protected classification characteristics under California or federal law	Gender and date of birth
D. Commercial information	Transaction information, purchase history, financial details, and payment information
F. Internet or other similar network activity	Browsing history, search history, online behavior, interest data and interactions with our and other websites, applications, systems, and advertisements
G. Geolocation Data	Device location
H. Sensory Data	Audio, electronic, visual, thermal, olfactory, and similar information
I. Professional or employment-related information	Work history and/or professional qualifications if you apply for a job with us

Right to Know. If you are a California resident, you have a right to request, twice per year, that we provide to you (i) a list of the categories/and or specific pieces of personal information about you that we have collected during the calendar year preceding your request, (ii) the categories of sources for that personal information, (iii) the purposes for which we use that information, (iv) the categories of third parties with whom the business discloses the information, and (v) the categories of information that the business sells or discloses to third parties. Additionally, under California’s “Shine the Light Law”, California residents can request information about personal information, if any, disclosed to third parties’ for their direct marketing purposes within the preceding calendar year. To submit your request, please **email [insert e-mail address....]with the subject line “California Privacy” and your request in the body of your email.**

[Right to Opt Out of Sharing or Sale of Personal Information. California residents may opt-out by **[list all opt out methods and how to do so]** e-mailing **[e-mail address of company]** and indicating in the e-mail, (i) your name, address and e-mail address, (ii) that you are a resident of California, and (iii) you are exercising your right to opt-out of the “sale” of your personal information. You may also make this request by calling our Customer Service

Department at *[telephone number of company]*, and providing the same information and request. You do not need to create an account with us to exercise this right.]

Right to Request Correction or Deletion. You have the right to manage, change, correct, limit or delete your personal information and can do so through and may do so through **[account/profile]** settings by **[....]**. You can also permanently delete your account by **[....]**. You have the right to request that we delete any personal information that we collected from you and retained, subject to certain exceptions such as our compliance requirements resulting from a legal obligation or if we need the personal information for a reason related to our business such as providing our products to you.

How to Exercise Your California Privacy Rights. **[contact us at.....]**

7. SECURITY

We use reasonable security measures that are designed to protect personal information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please note, however, that no data security measures can be guaranteed to be completely effective. Consequently, we cannot ensure or warrant the security of any personal information or other information. You transmit personal information to us at your own risk.

[This paragraph is intended to elaborate on the above and provide specifics of whatever security measures Co-lab decides to use. The language below is an example of some measures that are typically utilized] We implement a variety of security procedures to maintain the safety of your personal information when you place an order or access your personal information. **[We offer the [use of a secure server.] All supplied sensitive/credit information is transmitted via [...]** and then **[encrypted into our payment gateway provider's database only to be accessible by those authorized with special access rights to such systems and who are required to keep and maintain the information confidential.]** After a transaction, **[your personal private information (credit cards, social security numbers, financials, etc.) will not be kept on file for more than [[60 days.]]**

8. INFORMATION CHOICES AND CHANGES

[Our marketing emails tell you how to “opt-out.” If you opt out, we may still send you non-marketing emails.] Non-marketing emails include emails about your accounts and our business dealings with you. **[You may adjust your notification and marketing preferences in the notifications/preferences page of/in your account [profile].]** You may send requests about personal information to our Contact Information below.

You can typically remove and reject cookies from our site with your browser settings. Many browsers are set to accept cookies until you change your settings. If you remove or reject our cookies, it could affect how our Site works for you.

9. CHANGES TO THIS PRIVACY POLICY

We may occasionally update this policy. When we do, we will revise the “last updated” date at the top of the policy. Your continued use of the Site after such changes will be subject to the then-current policy. Notice of material changes will be posted on the Site's homepage and/or will be provided by e-mailing you or notifying you upon login about these changes; the form of such notice is at our discretion. However, we encourage you to periodically review this policy to stay informed about how we collect, use, and disclose personal information. You should refer to this policy on an ongoing basis so you understand our current privacy policy. Your continued use of Co-Lab-o-Rate constitutes your: (a) acknowledgement of the privacy policy currently in effect; and (b) agreement to abide and be bound by the privacy policy.

10. SITE TERMS OF SERVICE

By using our Site, you consent to our Site Terms of Service available [HEREIN \(hyperlink to ToS\)\]](#).

11. CONTACT INFORMATION

[list relevant contact information here.]